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Federal Trade Commission Consumer Response Center 600 Pennsylvania Avenue, NW Washington, DC 20580

July 30, 2025

Subject: Complaint Regarding Potential Acquisition of CNBC by Jeff Bezos, Amazon's Anti-Union Practices, Election Interference, Tax Fraud, Systemic OSHA Violations, Failure to Honor Tax Credit Agreements, and Monopolistic Practices

Dear Sir or Madam,

I am writing to file a formal complaint regarding the reported interest of Jeff Bezos, through his personal investment entities or affiliates, in acquiring CNBC, a major financial news network owned by Comcast Corporation. Credible reports (e.g., The New York Post, January 2025; Puck News) suggest Mr. Bezos is exploring this purchase, raising significant concerns about antitrust violations, media consolidation, Amazon's harassment of union organizers, election interference, tax fraud, systemic OSHA violations, failure to honor tax credit agreements, and monopolistic practices in the bookselling and other markets. I urge the Federal Trade Commission to investigate this potential transaction to ensure compliance with federal laws, protect workers' rights, safeguard democratic processes, and address financial, safety, tax credit, and competitive misconduct.

#### Nature of the Complaint

The potential acquisition of CNBC by Jeff Bezos, who owns The Washington Post and exerts significant influence over Amazon's media ventures (e.g., Prime Video, Amazon MGM Studios), could substantially lessen competition in the media and financial news sectors, in violation of Section 7 of the Clayton Antitrust Act and Section 5 of the Federal Trade Commission Act. Amazon's documented anti-union practices, risks of election interference, tax fraud, OSHA violations, tax credit failures, and monopolistic practices amplify the public harm. My concerns include:

- 1. Market Concentration and Reduced Competition:
- Mr. Bezos' ownership of The Washington Post and Amazon's media ventures grant him significant influence. Acquiring CNBC could consolidate control over financial journalism, reducing the diversity of voices.
- This consolidation could limit consumer access to independent financial, labor, political, tax, safety, tax credit, and antitrust news, potentially skewing reporting to favor Mr. Bezos' or Amazon's interests, including concealing misconduct in these areas.

- 2. Potential for Anticompetitive and Monopolistic Practices:
- The FTC's 2023 antitrust lawsuit against Amazon, set for trial in October 2026 in Seattle, accuses Amazon of monopolizing online marketplace services by harming merchants and hiking prices, with an 82% market share among online superstores stifling competition

(https://www.bloomberg.com/news/articles/2025-03-07/amazon-antitrust-case-turns-to-key-issue-who-are-its-rivals?embedded-checkout=true). The FTC is still identifying Amazon's competitors (e.g., Walmart, eBay), highlighting how Amazon's conduct harms rivals by leveraging its market dominance.

• Amazon's monopolistic practices in the bookselling and publishing industries, as detailed in the ABA white paper "The Stepping Stone to Monopoly"

(https://www.bookweb.org/sites/default/files/diy/Amazon-WhitePaper-FINAL.pdf), demonstrate a pattern of anticompetitive behavior that began with books and expanded to other markets. Amazon controls an estimated 60% of print book sales, 90% of e-book sales, and up to 90% of audiobook sales through Audible, constituting a monopoly. Specific tactics include:

- Predatory Pricing: Amazon sells books below cost or below the traditional 40% publisher discount, undercutting independent bookstores, which cannot compete with such losses. This displaced 136,000 retail shops and 1.7 million retail workers between 2014 and 2021 (Civic Economics, 2022). Independent booksellers, such as Susan Hinkle of Page After Page Bookstore, report losing customers to Amazon's below-cost pricing, reducing employment from three to one (ABA white paper).
- Monopsony Power: Amazon's dominance forces publishers to accept steep discounts and unfavorable terms, reducing author and publisher revenues.
   The Association of American Publishers (2019) noted Amazon dictates economic terms, with publishers paying more for distribution and advertising while receiving less. This "waterbed effect" forces suppliers to charge smaller buyers higher prices, harming competition (Washington Monthly, 2023).
- Coercive Tactics: Amazon retaliates against publishers (e.g., Hachette in 2014, Macmillan in 2010) by delaying shipments, removing buy buttons, or listing titles as out of stock to enforce compliance, as reported by the House Judiciary Antitrust Subcommittee (2020). For example, Press 53 reported Amazon listed their titles as "temporarily out of stock" to push e-book sales, which are more profitable for Amazon.
- Acquisitions and Exclusivity: Amazon's 2008 acquisition of Audible, controlling 65–90% of the audiobook market, uses exclusivity agreements (e.g., Audible Exclusive) and Digital Rights Management (DRM) to lock consumers into its platform, limiting access for libraries and independent bookstores. Over 40,000 titles, including Margaret Atwood's The Handmaid's Tale, are restricted from libraries, harming low-income and disabled communities (Fight for the Future).
- Flouting Sales Tax Laws: In the 1990s and 2000s, Amazon avoided collecting sales taxes in 45 states despite having nexus through online affiliates, gaining an illegal price advantage over independent bookstores. By 2014, Amazon complied after states clarified nexus laws, but the delay allowed exponential growth (ABA white paper).
- A Bezos-owned CNBC could obscure these practices by biasing coverage of Amazon's market dominance, further entrenching its monopoly power across multiple sectors.

- 3. Amazon's Harassment of Union Organizers:
- Amazon has faced allegations of harassing union organizers, as documented by the National Labor Relations Board (NLRB). A 2022 NLRB ruling found Amazon illegally threatened workers at its Staten Island facility (The New York Times, 2021).
- A Bezos-owned CNBC could bias labor coverage, reducing public awareness of union efforts and emboldening Amazon's anti-union strategies, harming workers' rights.
- 4. Risk of Election Interference:
- Mr. Bezos' control of CNBC could enable undue influence over political discourse. The Washington Post's coverage has faced bias criticism, and CNBC could similarly sway voter perceptions on economic policies or candidates, risking election interference. The ABA white paper notes that Amazon's dominance over information distribution channels, like books, can influence the marketplace of ideas and elections, a risk amplified by media ownership

(https://www.bookweb.org/sites/default/files/diy/Amazon-WhitePaper-FINAL.pdf).

- Amazon's data capabilities, combined with CNBC's platform, could amplify political narratives, threatening democratic processes.
- Allegations of Tax Fraud and Avoidance:
- Amazon has faced scrutiny for tax avoidance, as detailed in a February 2022 ITEP report, which notes Amazon avoided \$5.2 billion in federal corporate income taxes in 2021, paying a 6% tax rate on \$35 billion in U.S. income, compared to the statutory 21% rate, which would have yielded \$7.3 billion. Over four years, Amazon paid a 5.1% federal tax rate on \$78 billion in U.S. income, using tax credits (\$1.1 billion), stock option deductions (\$1 billion), and the FDII deduction (\$300 million)

(https://itep.org/amazon-avoids-more-than-5-billion-in-corporate-income-taxe s-reports-6-percent-tax-rate-on-35-billion-of-us-income/). These practices, while legal, raise concerns about potential tax fraud or unethical manipulation, which a Bezos-owned CNBC could obscure by suppressing tax policy coverage.

- Systemic OSHA Violations and Workplace Safety Concerns:
- Amazon has been cited for numerous OSHA violations, demonstrating a pattern of systemic safety failures across its warehouses. A December 2024 Senate HELP Committee report revealed that Amazon warehouses recorded over 30% more injuries than the industry average in 2023, with workers nearly twice as likely to be injured over seven years. More than two-thirds of Amazon's warehouses exceed industry injury rates, driven by relentless productivity demands causing musculoskeletal disorders. Amazon knowingly prioritized profits over safety, rejecting injury-reducing measures and misrepresenting injury data to regulators

(https://www.help.senate.gov/dem/newsroom/press/news-sanders-releases-sweeping-report-exposing-how-amazons-obsession-with-speed-injures-work ers-at-unprecedented-rates).

• OSHA's February 1, 2023, citations at Amazon warehouses in Aurora, CO; Nampa, ID; and Castleton, NY, identified ergonomic hazards (high-frequency lifting, heavy package weights, awkward postures, long hours) leading to high rates of musculoskeletal disorders, with proposed penalties of \$46,875. These followed similar citations in July 2022 at Deltona, FL; Waukegan, IL;

and New Windsor, NY (\$60,269 in penalties), and 14 recordkeeping violations in December 2022 for failing to log injuries properly. Additional citations in April 2023 at Castleton, NY, highlighted inadequate medical treatment, exacerbating injuries

(https://www.osha.gov/news/newsreleases/national/02012023). The U.S. Attorney's Office for the Southern District of New York referred these cases, and ongoing investigations (20 open as of 2023) suggest Amazon may have concealed injury data

(https://www.justice.gov/usao-sdny/pr/amazon-cited-osha-based-sdny-referrals-serious-violations-exposed-workers-safety).

- Pattern of Violations: The pattern includes consistent ergonomic hazards, recordkeeping failures, and inadequate medical care across facilities in multiple states (FL, IL, NY, CO, ID, MN, NJ). OSHA's Assistant Secretary Doug Parker emphasized Amazon's failure to implement known safety measures, corroborated by the Senate report's findings that Amazon rejected its own ergonomics program to prioritize profits. This systemic neglect, affecting over two-thirds of Amazon's warehouses, endangers workers nationwide.
- A Bezos-controlled CNBC could downplay these violations, reducing scrutiny and endangering workers by limiting public awareness of systemic safety failures.
- 7. Failure to Honor Tax Credit Agreements (Melville, NY):
- Amazon has been criticized for failing to meet tax credit commitments, as exemplified at its Melville, NY warehouse. A Newsday article (June 2020) reports that Hartz Mountain Industries, developing a 276,500-square-foot warehouse for Amazon on Ruland Road, terminated nearly \$5 million in tax incentives from the Suffolk County Industrial Development Agency (IDA) because Amazon could not guarantee creating 175 jobs within two years, as stipulated. Hartz Mountain placed \$1.9 million in escrow for sales tax exemptions, while \$274,107 in mortgage recording tax benefits and \$2.7 million in property tax savings over 20 years were terminated. The IDA's deputy executive director, Kelly Murphy, noted that this recapture was required by contractual terms, though uncommon

(https://dgnycommercial.com/amazon-warehouse-in-melville-loses-5-million-in-ida-tax-breaks/). This failure misuses public funds and erodes trust in tax incentive programs.

- A Bezos-owned CNBC could suppress coverage of such failures, shielding Amazon from accountability and undermining public discourse on tax credit integrity.
- 8. Consumer and Public Harm:
- Media consolidation under Mr. Bezos could increase consumer costs and limit access to diverse perspectives on labor, political, tax, safety, tax credit, and antitrust issues.
- Biased reporting could harm union organizers (via reduced labor coverage), voters (via skewed political narratives), taxpayers (via obscured tax fraud or credit misuse), workers (via minimized safety concerns), and competitors (via suppressed antitrust scrutiny). The ABA white paper warns that Amazon's control over book distribution threatens the marketplace of ideas, a risk heightened by media ownership

(https://www.bookweb.org/sites/default/files/diy/Amazon-WhitePaper-FINAL.pdf).

### Supporting Information

- Media Reports: The New York Post (January 2025) and Puck News report Mr. Bezos' interest in CNBC, though denied by his sources.
- Antitrust Concerns: The FTC's 2023 lawsuit alleges Amazon monopolizes online marketplace services, harming merchants and raising prices (<a href="https://www.bloomberg.com/news/articles/2025-03-07/amazon-antitrust-case-turns-to-key-issue-who-are-its-rivals?embedded-checkout=true">https://www.bloomberg.com/news/articles/2025-03-07/amazon-antitrust-case-turns-to-key-issue-who-are-its-rivals?embedded-checkout=true</a>).
- Monopolistic Practices: The ABA white paper details Amazon's 60% print book, 90% e-book, and 65–90% audiobook market share, using predatory pricing, monopsony power, coercive tactics, and acquisitions like Audible to dominate bookselling

(https://www.bookweb.org/sites/default/files/diy/Amazon-WhitePaper-FINAL.pdf).

- Amazon's Labor Practices: NLRB findings (2022 Staten Island case) and reports (The New York Times, 2021) document anti-union tactics.
- Election Interference Risks: Bezos' media influence and Amazon's data capabilities, combined with its control over book distribution, raise risks of biased political coverage (ABA white paper).
- Tax Fraud and Avoidance: ITEP (February 2022) reports Amazon avoided
  \$5.2 billion in 2021 federal taxes

(https://itep.org/amazon-avoids-more-than-5-billion-in-corporate-income-taxe s-reports-6-percent-tax-rate-on-35-billion-of-us-income/).

- OSHA Violations: The Senate HELP Committee (December 2024) reports Amazon's warehouses had 30% higher injury rates than the industry average in 2023
- (https://www.help.senate.gov/dem/newsroom/press/news-sanders-releases-sweeping-report-exposing-how-amazons-obsession-with-speed-injures-work ers-at-unprecedented-rates). OSHA citations (February 1, 2023) at Aurora, CO; Nampa, ID; and Castleton, NY, followed violations in FL, IL, and NY (https://www.osha.gov/news/newsreleases/national/02012023).
- Tax Credit Failure: Newsday (June 2020) details Amazon's Melville, NY facility losing \$5 million in IDA tax breaks for failing to meet job creation targets

(https://dgnycommercial.com/amazon-warehouse-in-melville-loses-5-million-in-ida-tax-breaks/).

• Comcast's Context: Comcast's spinoff of CNBC into Versant includes a two-year tax penalty period, which may delay but not preclude a sale.

## Requested Action

I respectfully request that the FTC:

- 1. Investigate any discussions or proposals related to Jeff Bezos' potential acquisition of CNBC to assess impacts on competition, labor rights, election integrity, tax transparency, workplace safety, tax credit agreements, and market fairness.
- 2. Examine how the acquisition could amplify Amazon's anti-union practices, enable election interference, obscure tax fraud, suppress OSHA violation reporting, shield tax credit failures, and conceal monopolistic practices, as alleged in the FTC's 2023 lawsuit and ABA white paper.

- 3. Coordinate with the IRS (<u>irs.gov/compliance</u>), OSHA (<u>osha.gov/workers/file-complaint</u>), DOJ, and Suffolk County IDA to evaluate Amazon's tax practices, safety record, tax credit compliance, and antitrust violations.
- 4. Monitor Comcast's spinoff of CNBC into Versant to ensure compliance with antitrust, labor, tax, and safety regulations.
- 5. Solicit public comments and conduct a thorough review if a formal acquisition proposal is submitted, addressing media consolidation and its impacts.

Complainant Information

Helene Patricia de Boissiere 26-68 48th Street Astoria, NY 11103 deboissiere@gmail.com (415) 233-2048

#### **Additional Notes**

The FTC may require a formalized acquisition proposal for definitive action, but the public interest, risks to union organizers, election integrity, tax transparency, workplace safety, tax credit compliance, and market competition warrant proactive scrutiny. For tax fraud and credit issues, coordination with the IRS and Suffolk County IDA is advised. For OSHA violations, coordination with OSHA is critical, given the systemic pattern across multiple states. For antitrust and monopolistic practices, the FTC's ongoing 2023 lawsuit and the ABA white paper provide critical context.

I am available to provide further information. Please contact me at the above email address or phone number.

Thank you for your attention to this critical issue.

Sincerely,

Allre P. de Doissiere Helene P. de Boissiere